

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ROADSYNC, INC.,

Plaintiff,

v.

RELAY PAYMENTS, INC., SPENCER  
BARKOFF, and JAMES RYAN DROEGE,

Defendants.

Case No. 1:21-CV-03420-MLB

**DEFENDANTS' MOTION FOR LEAVE  
TO FILE UNDER SEAL**

Pursuant to Rule 7 of the Federal Rules of Civil Procedure, Part II(J)(2)(e) of Appendix H to the Local Rules, and Paragraph (n) of the Court's Standing Order Regarding Civil Litigation, Defendants Relay Payments, Inc. ("Relay"), Spencer Barkoff, and James Ryan Droege (collectively, "Defendants") respectfully move the Court to file under seal Defendants' Reply Brief in Further Support of Their Corrected Motion To Compel Plaintiff To Provide A Particularized Identification Of Its Alleged Source Code Trade Secrets (the "Reply"), as well as the Reply Declaration of Michael Fenn ("Fenn Reply Declaration").

The Reply and Fenn Reply Declaration contain references to the number of files in, file names and folder paths of, and the "architecture" of source code files

RoadSync has made available and designated “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant to the Amended Protective Order (Dkt. 65). RoadSync has previously requested that all such materials it has designated pursuant to the Amended Protective Order be filed under seal. It has further specifically requested to seal information concerning “the number of lines and files,” “file names and folder paths,” and “the architecture of” RoadSync’s source code. *See* Dkt. 92 at 4; Dkt. 95-1 at 4.

As a result, Defendants submit the Reply and the Fenn Reply Declaration under seal pursuant to the process described in Part II(J)(2)(d)-(e) of Appendix H to the Local Rules. RoadSync has been served with this Motion to Seal via the ECF system, and pursuant to Part II(J)(2)(e) of Appendix H to the Local Rules, RoadSync has the burden of establishing good cause for sealing.

DATED: February 24, 2023

*/s/ Ryan Landes*

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Ryan Landes (admitted *pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

Dated: February 24, 2023

/s/ Ryan Landes

Ryan Landes (admitted *pro hac vice*)

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